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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re
THE LITIGATION PRACTICE GROUP,
P.C.,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. No. 8-25-ap-01105-SC

**SECOND STIPULATION TO EXTEND
TIME TO RESPOND TO COMPLAINT**

Complaint Filed: March 10, 2025
The Honorable Scott C. Clarkson

RICHARD A. MARSHACK, Trustee of
the LPG Liquidation Trust,

Plaintiff,

vs.

WORLD GLOBAL FUND, LLC, et al.,

Defendants.

1 **PLEASE TAKE NOTICE** that Plaintiff and Chapter 11 Trustee Richard A. Marshack
2 (the “Trustee”) and Defendant Solomon Feig (“Feig,” together with the Trustee, the “Parties”),
3 hereby stipulate and agree (the “Stipulation”), through their respective counsel, as follows:

4 A. On March 10, 2025, Plaintiff filed a Complaint for: (1) avoidance, recovery, and
5 preservation of 2-year actual fraudulent transfers, (2) avoidance, recovery, and preservation of 2-
6 year constructive fraudulent transfers, (3) demand for accounting against World Global Fund,
7 LLC, OptimumBank Holdings Inc., OptimumBank, and OptimumBank.com, (4) turnover of estate
8 property, (5) fraud and/or conversion/theft committed by World Global, LLC, Dembitzer, Feig,
9 the alter egos, and the Dembitzer alter egos – the fraudulent ACH transactions, (6) fraud and/or
10 conversion/theft committed by World Global, LLC, Dembitzer, Feig, the alter egos, and the
11 Dembitzer – unreimbursed funds from the MCA agreements, (7) aiding and abetting fraud and/or
12 conversion/theft by Moishe Gubin, OptimumBank Holdings Inc., OptimumBank,
13 OptimumBank.com, (8) aiding and abetting by Moishe Gubin, OptimumBank Holdings Inc.,
14 OptimumBank, OptimumBank.com, and (9) conspiracy to commit fraud. [Docket. No. 1].

15 B. On March 18, 2025, Plaintiff served Feig with a copy of the Summons and
16 Complaint. [Docket No. 9].

17 C. The initial deadline for Feig to respond to the Complaint was April 14, 2025.
18 [Docket No. 6].

19 D. On April 14, 2025, Feig filed a *Stipulation to Extend Time to Respond to Complaint*
20 (the “First Stipulation”). [Docket No. 31]. In the First Stipulation, the parties agreed to extend the
21 deadline for Feig to file and serve any response to Plaintiff’s Complaint from April 14, 2025 to
22 April 28, 2025, with the understanding that an additional extension might be needed, as the
23 attorney whom Feig was in the process of retaining as principal counsel was traveling
24 internationally at the time. [*Id.* at 3].

25 E. On April 15, 2025, the Court granted the First Stipulation. [Docket No. 35]

26 F. On April 25, 2025, to allow Feig and his counsel additional time to confer about
27 and prepare a response, Plaintiff agreed to a 14-day extension of Feig’s deadline to respond to the
28 Complaint, extending the deadline from April 28, 2025 to **May 12, 2025**.

STIPULATION

WHEREFORE, based on the above and the foregoing, the Parties stipulate and agree as follows:

1. The deadline for Solomon Feig to file and serve any response to Plaintiff's Complaint shall be extended from April 28, 2025 to **May 12, 2025**.

IT IS SO STIPULATED.

Dated: April 25, 2025

DINSMORE & SHOHL LLP

By


Karen S. Hockstad

Special Counsel to Richard A. Marshack, Trustee
of the LPG Liquidation Trust

Dated: April 25, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By

/s/ Ira D. Kharasch
Ira D. Kharasch

Dated: April 25, 2025

**MORVILLO ABRAMOWITZ GRAND IASON &
ANELLO P.C.**

By



Christopher B. Harwood (*pro hac vice* application
forthcoming)

Attorneys for Solomon Feig

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

700 Louisiana Street Suite 4500, Houston, TX 77002

A true and correct copy of the foregoing document entitled (*specify*): **SECOND STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **April 25, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Christopher Ghio on behalf of Plaintiff Richard A Marshack
Christopher.Ghio@dinsmore.com, angelica.urena@dinsmore.com
Karen Hockstad on behalf of Plaintiff Richard A Marshack
karen.hockstad@dinsmore.com, kim.beavin@dinsmore.com
Karen Hockstad on behalf of Trustee Richard A Marshack (TR)
karen.hockstad@dinsmore.com, kim.beavin@dinsmore.com
Richard A Marshack (TR)
pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
Matthew Sommer on behalf of Plaintiff Richard A Marshack
matthew.sommer@dinsmore.com, carrie.davis@dinsmore.com
Matthew Sommer on behalf of Trustee Richard A Marshack (TR)
matthew.sommer@dinsmore.com, carrie.davis@dinsmore.com
United States Trustee (SA)
ustpregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 25, 2025
Date

Hope R. Daniels
Printed Name

/s/ Hope R. Daniels
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.